

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY BUCKS HOLDINGS LLC,

Debtor.

MARC ABRAMS,
In his capacity as Chapter 7 Trustee of Lucky
Bucks Holdings LLC and as assignee,

Plaintiff,

v.

TRIVE CAPITAL MANAGEMENT LLC,
et al.,

Defendants.

Chapter 7

No. 23-10756 (KBO)

Adversary Proceeding

No. 24-ap-50130 (KBO)

**SECOND DECLARATION OF ROSS E. FIRSENBAUM IN SUPPORT OF
TRIVE DEFENDANTS' MOTION TO COMPEL**

I, Ross E. Firsenbaum, an attorney duly admitted to practice law in the State of New York and the Commonwealth of Massachusetts, declare under penalty of perjury as follows:

1. I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, which is counsel for Trive Capital Management, LLC, Trive Capital Fund III LP, Trive Capital Fund III-A LP, TCFIII Luck LP, TCFIII Luck SPV LP, TCFIII Luck Acquisition LLC, Southern Star Gaming, LLC, and Shravan Thadani (collectively, the “Trive Defendants”) in the above-captioned matter. I make this declaration in further support of the *Trive Defendants’ Motion to Compel*, filed on August 12, 2025.

2. Attached as **Exhibit A** is a true and accurate copy of the *Plaintiff’s First Set of Requests for Production of Documents Propounded to Trive Defendants*, dated April 11, 2025.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 2, 2025
New York, New York

/s/ Ross E. Firsenbaum
Ross E. Firsenbaum